

AO 91 (Rev. 11/11) Criminal Complaint

UNITED STATES DISTRICT COURT

for the

Southern District of Texas

United States Courts
Southern District of Texas

FILED

August 24, 2023

Nathan Ochsner, Clerk of Court

United States of America

v.

Michael Ramone HOOKS

Case No.

4:23-mj-1710

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of Jan. 6, 2023 through Mar. 28, 2023 in the county of Harris in theSouthern District of Texas, the defendant(s) violated:

Code Section

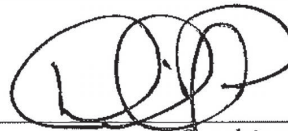
18 United States Code 1591

Sex Trafficking of a Minor

Offense Description

This criminal complaint is based on these facts:

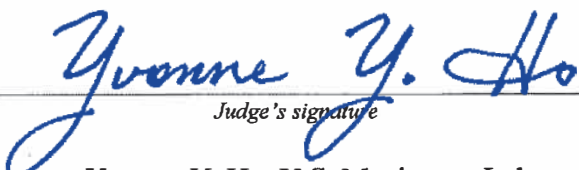
Continued on the attached sheet.



Complainant's signature

David Pawson, Special Agent

Printed name and title

Submitted by reliable electronic means, sworn to,
signature attested telephonically per Fed.R.Crim.P.4.1,
and probable cause found August 24, 2023

Judge's signature

Yvonne Y. Ho, U.S. Magistrate Judge

Printed name and title

City and state: Houston, Texas

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I, David Pawson, being duly sworn, herby depose and state the following:

1. I am a Special Agent with the United States Department of Homeland Security, Homeland Security Investigations (HSI) and have been since 2009. My experience as a Special Agent has included, among other things, the investigation of cases involving cybercrime, child exploitation, child pornography and human trafficking. I have received specialized training in the investigation of child exploitation offenses and human trafficking. I have also received training and have gained experience in interviewing and interrogation techniques, arrest procedures, search warrant applications, the execution of searches and seizures, and various other criminal laws and procedures
2. This Affidavit is made in support of a criminal complaint charging Michael HOOKS, with violating 18 U.S.C. § 1591, which makes it a crime for someone who benefits, financially, or by receiving anything of value, knowing, or in reckless disregard of the fact, that means of force, threats of force, fraud, coercion, or any combination of such means will be used to cause the person to engage in a commercial sex act, or that person has not attained the age of eighteen years and will be cause to engage in a commercial sex act.
3. I am familiar with the information contained in the Affidavit based upon the investigation that I and other law enforcement officers have conducted and any of my conversations with other parties involved in this case.
4. Because the Affidavit is being submitted for the limited purpose of securing a criminal complaint, I have not included each and every fact known to me concerning this investigation, I have set forth only those fact I believe are necessary to establish probable cause that evidence of a violation of 18 U.S.C. 1591 has been committed by Michael HOOKS starting from approximately January 6, 2023, through March 28, 2023. Where statements of others are set forth in this Affidavit, they are set forth in substance and in part.
5. In July of 2023, Homeland Security Investigations (HSI) Special Agents (SAs) initiated an investigation into Michael HOOKS (DOB 06/30/1999), a suspected trafficker who is allegedly involved in the trafficking and prostitution of females, including juveniles, in the Houston, Texas (TX) area.
6. On January 26, 2023, Minor Victim 2 (MV2) (DOB: 05/28/2006) was identified and rescued on Bissonnet Street in Houston, TX. (Agent Note: The Bissonnet Street and Plainfield Street area of Houston, TX is known to investigators as the "Blade." Based on your affiant's training and experience, Affiant knows that a "Blade" is an area known for prostitution activity where persons, often trafficking victims, walk around a specific area where it is known that prostitution occurs. Customers drive by, select a person for commercial sex and either engage in the sex acts in the vehicle and/or go to a nearby

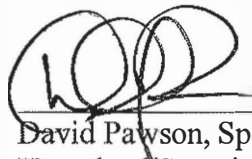
hotel/motel to complete the sex act – often referred to as a date.) MV2 was sixteen years of age at the time of her rescue.

7. During multiple interviews with MV2, MV2 stated Michael HOOKS, aka KING MULA, recruited her to come work for him in January of 2023. MV2 stated at the time she was working for Antonio OSORIO-Avelar, and ignored HOOKS' recruitment attempts in fear of retaliation from OSORIO. (Agent Note: Antonio OSORIO-Avelar plead guilty in cause number 4:23-cr-156 to the trafficking of Minor Victim 2.) HOOKS repeatedly approached MV2 and attempted to recruit her to join his HTO. MV2 described HOOKS' persistent attempts. Furthermore, HOOKS even had other women who engaged in commercial sex under his authority speak to MV2 in attempt to convince her to join his HTO. MV2 rebuffed these early attempts because she knew OSORIO would be upset. MV2 stated eventually her loyalty towards OSORIO began to waiver and she started to communicate with HOOKS via Instagram after he provided her with his username one night. HOOKS and MV2 transitioned from solely communicating via direct messages on Instagram to calls, FaceTime videos, Instagram videos, and Snapchat messages. During these communications, HOOKS attempted to convince MV2 to engage in commercial sex under his authority. MV2 stated HOOKS began to suspect that MV2 was a minor, to which she confirmed with him, by telling him she was sixteen years old. MV2 stated after she told HOOKS she was a minor, "he started talking to me more than before." HOOKS continued to attempt to recruit MV2 to join his HTO. Approximately one week after they initiated communications, HOOKS picked MV2 up from where she was supposed to be advertising herself for commercial sex along Bissonnet Street. HOOKS transported MV2 to a nearby parking lot, where he told her she should give him some money. MV2 described this money as a "choosing fee." (Agent Note: "Choosing fee" is a common term used within the human trafficking subculture to refer to proceeds that a woman must pay a trafficker before she can join his HTO.)
8. MV2 gave HOOKS approximately two hundred (\$200) dollars and they had sexual intercourse in his car. MV2 confirmed HOOKS knew she was sixteen (16) years old before they had sex. MV2 also confirmed that HOOKS knew the money she gave him was proceeds of commercial sex earned while she was being sex trafficked as a victim of OSORIO's HTO. MV2 told HOOKS that she was also earning proceeds by selling child pornography which she created of herself. HOOKS told her to send some of those proceeds to him. MV2 estimated that she sent HOOKS between one hundred fifty (\$150) and two hundred (\$200) dollars in proceeds that she earned through the sale of herself created child pornography. MV2 instructed customers who wanted to purchase child pornography via the internet to send the proceeds directly to HOOKS' CashApp account.
9. The night MV2 was recovered, January 26, 2023, was the same night she and HOOKS agreed she would leave OSORIO and join his HTO. MV2 described that when she was encountered by HSI SAs, HOOKS was sitting in the Burger King restaurant parking lot next door waiting for her to get into his vehicle. MV2 also identified a photo of HOOKS as well as his phone number.

10. Based on consent, HSI SAs reviewed the contents of MV2's cellphone. HSI SAs discovered a text conversation between MV2 and HOOKS. (Agent Note: This phone number was confirmed by MV2 as belonging to HOOKS.)
- a. During the text conversation, HOOKS requests MV2 to send him photos and videos of herself. Also, MV2 is having other people who are purchasing videos and photos of herself send them money to HOOKS via CashApp.
 - b. On January 26, 2023, HOOKS and MV2 further discuss MV2's age. HOOKS states, "Everyone talkin bout it... Your age," MV2 responds, "who" which HOOKS responds, "Pimps." MV2 responds, "mane fuck them, they just mad cause I aint choosing up...ommm once im wit u shi we finna switch up tha looks cuz he got me lookin young."
 - c. Later in the conversation MV2 and HOOKS are discussing how MV2 is going to leave OSORIO and begin working for HOOKS to which HOOKS states, "Okay that's fine and that means tonight all your trap comes to me." (Agent Note: Based on your affiant's training and experience, Affiant knows that a "trap" is commonly referred to profits gained from illicit activity.)

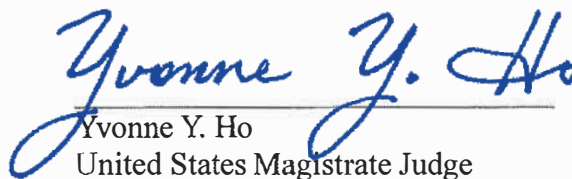
CONCLUSION

11. Based upon the information set forth above, I believe that probable cause exists for the issuance of a Criminal Complaint charging Michael HOOKS with violation of 18 U.S.C. § 1591, which makes it a crime for someone who benefits, financially, or by receiving anything of value, knowing, or in reckless disregard of the fact, that means of force, threats of force, fraud, coercion, or any combination of such means will be used to cause the person to engage in a commercial sex act, or that person has not attained the age of eighteen years and will be cause to engage in a commercial sex act.



David Pawson, Special Agent
Homeland Security Investigations

Signed and sworn to before me telephonically this 24th day of August 2023 and I find probable cause.



Yvonne Y. Ho
United States Magistrate Judge